RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS

January 2021

Solid Waste Management Unit 17 – PCB Capacitor Burial/Pole Yard
Naval Support Activity Crane

300 Highway 361
Crane, Indiana 47522
Davies, Greene, and Martin Counties
EPA ID No. IN5170023498

I. INTRODUCTION

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any releases of hazardous waste or hazardous constituents at or from their facilities.

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM) for Solid Waste Management Unit (SWMU) 17 – PCB Capacitor Burial/Pole Yard at Naval Support Activity (NSA) Crane located in Crane, Indiana. SWMU 17 is identified in Attachment 0 of the Indiana State RCRA Hazardous Waste Management Permit for the facility as SWMU 17/04. A separate statement of basis has been prepared for Building 2721, designated as SWMU 17a, which was one of the sources of polychlorinated biphenyls (PCBs) to SWMU 17, as discussed below. Following the completion of interim measure (IM) activities in 2016 and post-IM confirmation sampling conducted in 2019, IDEM has determined that no further action (NFA) is necessary for SWMU 17. The Region 5 United States Environmental Protection Agency (USEPA) concurred with this determination. A permit modification will be completed following the closing of the comment period for this Statement of Basis to change the designation of SWMU 17 to NFA.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance and is using the administrative procedures in 40 Code of Federal Regulations (CFR) Part 270, as adopted by reference, to provide public notice and solicit comment on the corrective action for SWMU 17. The public notice period is hereby announced and will continue for 45 days from the published date of the public notice in the *Bedford Times Mail*. If requested, a public hearing will be held to accept comments.

This Statement of Basis summarizes information found in greater detail in SWMU 17 work plans, reports, and other documents included in this facility's Administrative Record, which can be accessed via IDEM's Virtual File Cabinet (VFC) at http://vfc.idem.IN.gov/. IDEM encourages the public to review these documents to gain a more comprehensive understanding of the facility and the activities that have been conducted at SWMU 17 under RCRA authority. IDEM may modify this corrective action determination or select another remedy based on public comments or if new information is obtained.

II. FACILITY BACKGROUND

NSA Crane covers approximately 100 square miles and is located in a rural sparsely populated area of south-central Indiana. Most of NSA Crane is forested, and the surrounding area is wooded or farmed land. NSA Crane manufactures, renovates, and tests equipment, shipboard weapons systems, and ordnance for the United States Navy and Army.

SWMU 17 is located in the central portion of NSA Crane as shown on Figure 1, which also shows the general layout of SWMU 17. SWMU 17 is located on a flattened ridgetop that has moderately steep sideslopes on the north, west, and south. The topography is generally flat on the ridgetop and in the vicinity of Building 357.

SWMU 17 has been in use since before 1966 and historically has been used for the storage of electrical capacitors, electrical transformers, and creosote-impregnated utility poles. Two major contaminant source areas at SWMU 17 were identified to be the open storage area around Building 357 and floor drains from Building 2721 (see Figure 1). Contaminants were primarily polychlorinated biphenyls (PCBs) in soil and sediment and, to a lesser extent, polycyclic aromatic hydrocarbons (PAHs) in surface water. PCBs have not been detected in groundwater at SWMU 17. Transformers were stored in the portion of the gravel lot located north and west of Building 357/east and south of Building 3072. The gravel areas to the north of Building 357 were used as utility pole and transformer laydown areas and were potential sources of PCB, PAH, and pentachlorophenol [PCP] contamination to surrounding soil. Building 2721, located at the eastern end of SWMU 17 and upgradient of Ditch 3, was previously used as an electrical transformer maintenance facility. PCB contamination was found in and around an oil-water separator (OWS) formerly located approximately 15 feet northwest of Building 2721. It was reported that the OWS likely was connected to floor drains inside the building. The OWS was reportedly removed circa 1989. Despite early reports of capacitors having been buried at SWMU 17, after implementing a geophysical investigation, intensive soil sampling, and widespread excavation of soils from the areas suspected to contain capacitors, no buried capacitors were found.

III. SITE ASSESSMENT

Assessments of the two source areas and nearby ditches began in the 1990s. Geophysical surveys,

numerous delineation sampling events, and multiple interim measure (IM) removals were completed to address the PCB contamination. An IM for surface and subsurface soil was conducted by TolTest in 2004, and soil and sediment IMs were completed in two phases between April 2013 and September 2014 by SEQ Vets and VRHabilis-Kemron, respectively. Phase 1 was excavation and removal of PCB-contaminated soil around Buildings 357 and 2721. Phase 2 was excavation and removal of PCB-contaminated soil and sediment in ditches and associated floodplains. After the initial removal of contaminated sediment from Ditch 3 during the Phase 2 IM in 2014, new PCB contamination was detected in sediment near the head of Ditch 3 on the eastern portion of SWMU 17. During the IM, some black oily material was found in very shallow bedrock approximately 5 feet downstream of the culvert opening. The oily material appeared to be localized and was removed. Tetra Tech conducted an additional investigation in 2015 to further delineate PCB contamination source areas and found that shallow bedrock was contaminated. The contaminated bedrock was thought to have been a reservoir for PCBs that recontaminated Ditch 3 sediments after the 2013 and 2014 phased IM. The results of the 2015 investigation are provided in the 2016 *Final Technical Memorandum for Additional PCB Source Delineation Sampling, Rock Coring, and Sediment Trap Installation at SWMU 17* (VFC#80360432). Subsequently, a third phase of the IM was completed by Tetra Tech in 2016 to remove PCB contamination near the head of Ditch 3 and included removal of contaminated sediments and bedrock in Ditch 3, as well as removal of adjacent contaminated floodplain soil. As provided in the 2018 IM Report (VFC#82537366), the goal to remove all soil, sediment, and bedrock in and near Ditch 3 with PCB concentrations of 1 milligram per kilogram (mg/kg) or greater was achieved.

A 2019 Supplemental RCRA Facility Investigation (RFI) Report Addendum (VFC#82806333) was completed to evaluate site conditions and human health and ecological risks after all prior IMs. The 1 mg/kg total PCB cleanup goal was generally attained throughout SWMU 17. The evaluation did not indicate unacceptable risk to human health. Also, no unacceptable risks to ecological receptors exposed to surface soil and sediment at the SWMU 17 were found. However, to ensure that PCBs were not continuing to be released to the stream, USEPA recommended the Navy conduct two rounds (one in spring and one in fall) of sediment monitoring (within one year) for PCBs at various locations along Ditch 3. USEPA also recommended sampling and analysis of surface water and sediment samples for PCP to determine whether PCP was potentially causing unacceptable risks to ecological receptors based on a previous detection of PCP in surface water above the ecological screening level. To address USEPA's recommendations, a sampling and analysis plan for post-IM confirmation sampling (VFC#82806329) was prepared, and a surface water and sediment investigation was conducted, consisting of two rounds of sampling (May and September of 2019) to determine whether sediment was recontaminated with PCBs since the 2016 IM. During this investigation, surface water and sediment samples were collected from several locations at SWMU 17 for analysis of PCP and PCBs. There were no concentrations of PCP or PCBs that exceeded their respective project action limits in surface water or sediment. Therefore, NFA was recommended for SWMU 17. USEPA had one minor comment on the Draft Final Report related to data validation and indicated that the report

could be finalized after addressing the comment. The USEPA comment and response were included as an appendix to the March 2020 *Surface Water and Sediment Sampling for Polychlorinated Biphenyls and Pentachlorophenol Report for SWMU 17* (VFC#83039085). Subsequently, USEPA concurred with the NFA recommendation in the report in a letter dated May 20, 2020.

IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

IDEM has determined that NFA is required for PCBs and PCP in sediment and surface water at SWMU 17, and USEPA has concurred with this determination. This corrective action determination is being issued for SWMU 17 without controls, indicating that there are no limits being placed on the site to restrict land use.

This NFA determination will complete the corrective action process under the RCRA Corrective Action Program for NSA Crane SWMU 17.

V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination. If a public hearing is requested, IDEM may hold a public hearing in Bedford, Indiana, to discuss any remedial actions the public proposes. IDEM will publish a newspaper notice 30 days in advance of the requested hearing.

The public notice and Administrative Record documents are available for review at IDEM's Virtual File Cabinet, which is found at http://vfc.idem.IN.gov/. VFC document numbers for documents cited in this Statement of Basis are provided in the text above.

After considering any comments received, IDEM will summarize the comments and its responses to the comments and will announce its decision in a Final Decision/Responses to Comments document. This document will be incorporated into the Administrative Record. To send written comments or obtain further information, contact:

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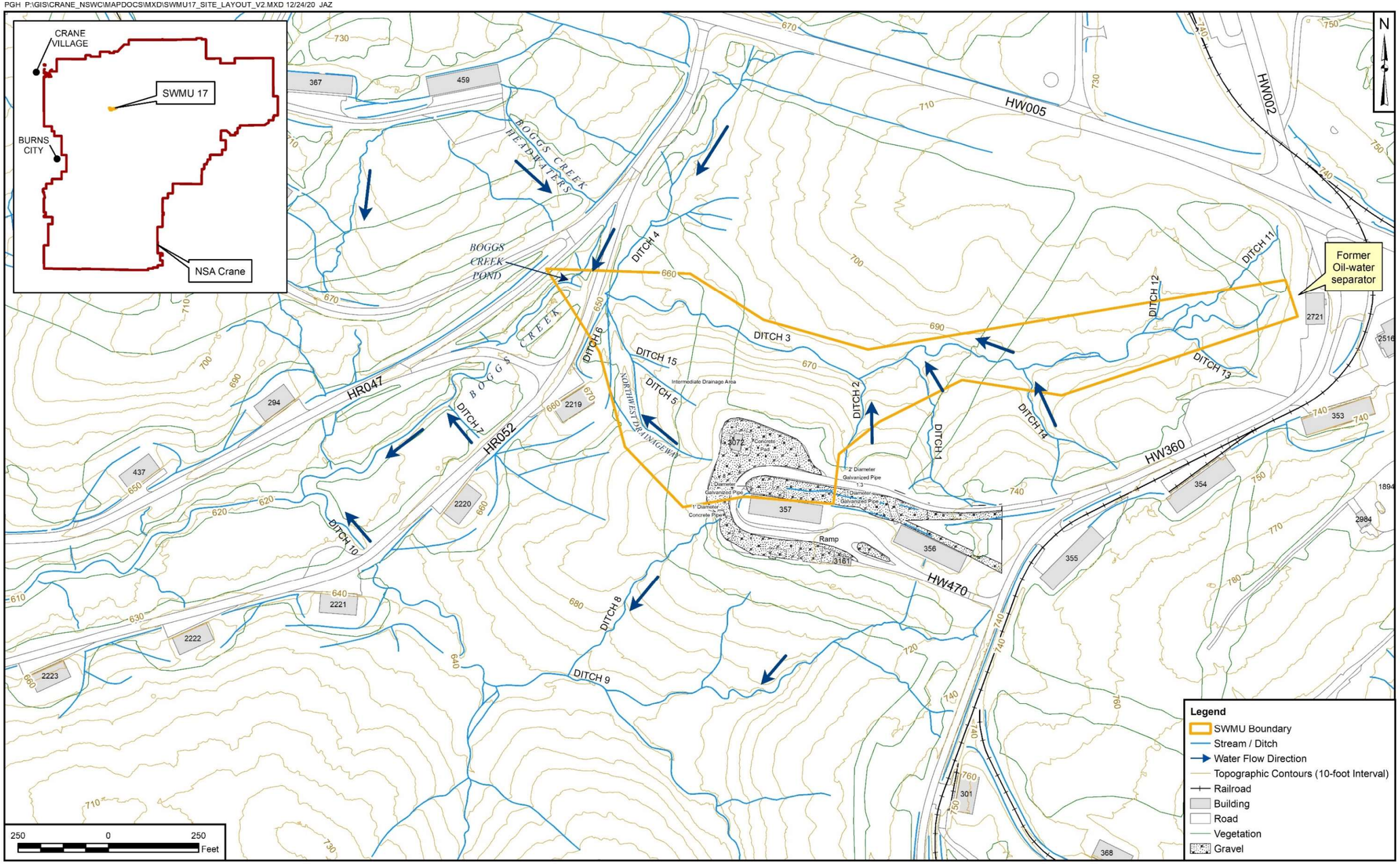

Figure 1 – SWMU 17 Location and Layout